## REMARKS/ARGUMENTS

Favorable consideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 33-37, 39-44, and 77 are pending in the present application. Claim 33 has been amended by the present amendment. Support for the present amendment is found in Applicants' originally filed disclosure. Thus, no new matter is added.

In the outstanding Office Action, Claims 33 and 44 were rejected under 35 U.S.C. §103(a) as unpatentable over Dunn et al. (U.S. Patent No. 5,134,564, hereinafter "Dunn") in view of Princen (U.S. Patent Publication No. 2005/031780); Claims 37, 40, 41, and 43 were rejected under 35 U.S.C. §103(a) as unpatentable over Dunn and Princen, in further view of Marcial et al. (U.S. Patent No. 7,340,421, hereinafter "Marcial"); Claims 34-36, 39, and 77 were rejected under 35 U.S.C. §103(a) as unpatentable over Dunn and Princen, in further view of Bellinger (U.S. Patent No. 6,023,705); and Claim 42 was rejected under 35 U.S.C. §103(a) as unpatentable over Dunn and Princen, in view of Marcial and Ashcroft et al. (U.S. Patent No. 7,364,667, hereinafter "Ashcroft").

Addressing now the rejection of Claims 33 and 44 under 35 U.S.C. §103(a) as unpatentable over Dunn and Princen, Applicants respectfully traverse this rejection.

Claim 33 recites, in part,

> a central processing unit;
> a source database to store source data pertaining to a financial account, the source data including at least one source document, the source data exhibiting a source balance;
> an application database to store ledger data pertaining to the financial account, the ledger data exhibiting a ledger balance; and
> an account reconciliation application executing, using the central processing unit, at the application database to create reconciliation documents that associate items of the ledger data with corresponding items of the source data pertaining to the financial account and determine reconciliation rules to reconcile any differences

between corresponding portions of the source balance and the ledger balance, the reconciliation documents being based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled, the account reconciliation application creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles, each of the reconciliation profiles having individualized reconciliation rules for reconciliation of the financial account.

The outstanding Office Action asserts, on pages 2-4, that Dunn and Princen describe all of the features recited in Claim 33. Applicants respectfully traverse this assertion.

Dunn discloses a system for computer-aided reconciliation that reconciles a first list (a bank statement) formed of a first number of first records and a second list (bank customer's list of records) formed of a second number of second records where the records affect the account balance for the bank statement.[1] According to Dunn, for each unmatched record in the first list, a corresponding record from the second list is selected based upon a match value.[2] Dunn notes that whenever the match value exceeds a threshold value, the corresponding records from the first list and the second list are paired and, thereafter, removed from the reconciliation processing.[3] Thus, in Dunn's system, the highest match value resulting from comparing record elements and other attributes of records from the first list and the second list is determined as a probable match for reconciliation.[4]

Additionally, Dunn notes that in order to achieve the above objectives, "a set of matching rules that produce 38 different match scores have been found to work well in a typical accounting environment."[5] Therefore, Dunn's reconciliation rules are fixed such that

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[1] Dunn: Abstract and columns 3-5
[2] Dunn: Abstract and columns 3-5
[3] Dunn: Abstract and columns 3-5
[4] Dunn: Abstract and columns 3-5
[5] Dunn: column 9, lines 30-33

the same reconciliation rules are used for every account. In other words, Dunn's system does

*not* have individualized reconciliation rules.

In contrast, Claim 33 recites that the *reconciliation profiles determine* how the

financial account is to be reconciled by, at least, determining *the reconciliation rules* and

thereby how the source balance and the ledger balance are to be reconciled and that *each of*

*the reconciliation profiles have individualized reconciliation rules* for reconciliation of the

financial account.

For example, in a non-limiting example of the present disclosure, reconciliation

profiles may include data specific to country X. Accordingly, the reconciliation rules may be

different for an account that corresponds to country X, as opposed to an account that

corresponds to a reconciliation profile that includes information specific to country Y. Thus,

as is noted above and is recited in Claim 33, *each of the reconciliation profiles have*

*individualized reconciliation rules* for reconciliation of the financial account.

Consequently, since Dunn's system relies on the same fixed rules for every account, it

is respectfully submitted that nothing in Dunn describes or suggests at least the claimed

reconciliation profiles having individualized reconciliation rules.

Furthermore, Applicants respectfully submit that Princen does not cure the above-

identified deficiencies of Dunn.

Princen describes a computing system for managing invoices.[6] Further, Princen

describes that many received invoices are set up differently and thus are not easily entered

into an accounting system.[7] Thus, in Princen, the system includes reconciliation rules which

match elements on the received invoices to corresponding elements in the accounting

system.[8] Princen further notes that during the review of an invoice, a user may assign an

accounting code to an accounting parameter of the invoice when no accounting code has been

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[6] Princen: Abstract
[7] Princen: Abstract
[8] Princen: paragraph [0023]

previously assigned, or modify an accounting code previously assigned to an accounting parameter.[9] According to Princen, the aforementioned operation enables the user to *complete the reconciliation of the accounting parameters of the invoice with the accounting codes of the buyer*.[10]

In other words, the Princen reference applies rules to reconcile accounting parameters with accounting codes. Thus, Princen's "reconciliation rules" do not correspond to the claimed "reconciliation rules" which are used to reconcile a financial account.

Furthermore, there is no teaching or suggestion in Princen of the claimed *reconciliation profiles* which *determine* how the financial account is to be reconciled by, at least, determining *the reconciliation rules*, and that *each of the reconciliation profiles have individualized reconciliation rules* for reconciliation of the financial account.

Nevertheless, the Office Action notes, on page 4, that Princen allows a user to "define a new reconciliation rule [which] will then be applied by the system to similar cases concerning next invoices."

Applicants respectfully submit that Princen's "new reconciliation rule" is based on the aforementioned assignation performed by the user between accounting parameters and accounting codes. For example, if the reviewer assigns accounting parameter A of the invoice to accounting code B of the buyer, then this association may be applied to future invoices, such that parameter A will always match code B.

Princen's aforementioned teaching does not correspond (or relate) to reconciliation profiles which *determine* how the financial account is to be reconciled by, at least, determining *the reconciliation rules* and that *each of the reconciliation profiles have individualized reconciliation rules* for reconciliation of the financial account, as is required by Claim 33.

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[9] Princen: paragraph [0027]
[10] Princen: paragraph [0027]

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Accordingly, <u>Dunn</u> and <u>Princen</u>, whether taken alone or in combination, do not describe, suggest, or render obvious the features recited in Claim 33.

Therefore, it is respectfully requested that the rejection of Claim 33, and claims depending therefrom, be reconsidered and withdrawn.

Addressing now the rejection of Claim 77 under 35 U.S.C. §103(a) as unpatentable over <u>Dunn</u>, <u>Princen</u>, and <u>Bellinger</u>, Applicants respectfully traverse this rejection and respectfully submit that Claim 77 also patently distinguishes over the cited combination for reasons in addition to this claim's dependence from Claim 33.

The outstanding Action asserts, on page 8, that <u>Dunn</u> describes the features of Claim 77. The Office further notes that according to <u>Dunn</u>, "elements such as date [and] amount of each record from L1 are compared to the corresponding elements of the record in L2." Applicants respectfully traverse this assertion.

It is respectfully submitted that nothing in <u>Dunn</u> describes or renders obvious that the reconciliation profiles define how the financial account is to be reconciled by associating only a portion of the items of ledger data and the corresponding items of source data pertaining to the financial account with a particular reconciliation profile.

In other words, Claim 77 recites that a particular reconciliation profile may only be associated with a portion of the items of ledger data and the corresponding items of source data. This allows different pairs of items of ledger data and source data to be reconciled differently. This feature is not disclosed in <u>Dunn</u> (or the cited combination) because there is no description or suggestion of *associating only a portion of the items of ledger data and the corresponding items of source data* pertaining to the financial account *with a particular reconciliation profile*.
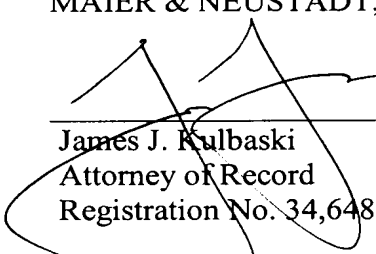
Thus, Applicants respectfully submit that Claim 77 also patentably distinguishes over the above noted cited references.

Accordingly, it is respectfully submitted that Claims 33-37, 39-44, and 77 are

allowable.

Consequently, in view of the present amendment, no further issues are believed to be

outstanding in the present application and the present application is believed to be in

condition for formal allowance. An early and favorable action is therefore respectfully

requested.

Respectfully submitted,

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